

EXHIBIT B

Amy Hood

From: mpeller@rkssl.com
Sent: Monday, June 12, 2023 4:54 PM
To: Heather.Waller@lw.com
Cc: mhampson@rkssl.com; jsparacio@rkssl.com
Subject: Re:

Heather,

To be clear, as stated in my email below, we will not be producing witnesses for depositions this week. To the extent you attempt to proceed with the deposition tomorrow without a witness as a display of theatrics, any costs incurred by you or your clients are not Plaintiffs' responsibility.

From: Heather.Waller@lw.com <Heather.Waller@lw.com>
Sent: Monday, June 12, 2023 9:27:51 AM
To: Matt Peller <mpeller@rkssl.com>
Subject: RE:

Matt, we disagree.

Heather A. Waller

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800 | Chicago, IL 60611
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From: Matt Peller <mpeller@rkssl.com>
Sent: Friday, June 9, 2023 1:34 PM
To: Waller, Heather (CH) <Heather.Waller@lw.com>
Subject: Re:

Just got your voicemail. We cannot accept service for Berger and Donovan, so you can go ahead and serve them if you wish.

As we've stated, we are not producing witnesses for the depositions next week. We have a request pending with the Court and are still seeking an extension of fact discovery until 60 days after the motion to dismiss decision, i.e., on or about August 7, 2023. We are working with our clients and the noticed employees (excluding Berger and Donovan, as above) to get potential deposition dates and will circle back with you when we have received those.

From: Heather.Waller@lw.com <Heather.Waller@lw.com>
Date: Thursday, June 8, 2023 at 9:45 PM
To: Matt Peller <mpeller@rkssl.com>
Subject: RE:

Matt,

Do you have any update on Berger / Donovan and your clients' other outstanding / deficient discovery? I'd appreciate the courtesy of at least a response. We don't want to personally serve individuals if we don't need to but you're leaving us with little choice and haven't even told us if you've spoken or been in contact with them.

I'm also amenable to moving next week's noticed 30b6 depositions and to discuss doing them efficiently with your witnesses' personal depositions if you provide options that we can make work later in June.

Finally, please immediately produce your clients' trading records or identify the bates where they've been produced. We believe we only have them in 408 communications, and all responsive records need to be produced to all parties.

Heather

From: Waller, Heather (CH) <Heather.Waller@lw.com>

Date: Wednesday, Jun 07, 2023 at 10:04 AM

To: Matt Peller <mpeller@rksllp.com>

Subject: RE:

Can you confirm regarding the others, Berger and Donovan? We just need to know either way today.

Heather A. Waller

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From: Matt Peller <mpeller@rksllp.com>

Sent: Monday, June 5, 2023 5:38 PM

To: Waller, Heather (CH) <Heather.Waller@lw.com>

Subject:

We can accept service of a deposition notice for Brad Murray, without waiving any rights to move to adjourn date or object to the notice.

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